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Attorneys for Defendant: Otto Trucking LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC;
Otto Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF NEEL CHATTERJEE IN
SUPPORT OF DEFENDANT OTTO
TRUCKING'S MOTION TO FILE UNDER
SEAL PORTIONS OF ITS OPPOSITION AND
NOTICE TO JOIN AND ADOPT
DEFENDANTS UBER TECHNOLOGIES,
INC.'S AND OTTOMOTTO LLC'S
OPPOSITION TO PLAINTIFF WAYMO
LLC'S MOTION FOR CONTINUANCE OF
TRIAL DATE**

Courtroom: 8 (19th Floor)
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:
1. Admin. Mtn. to File Document Under Seal
2. [Proposed] Order
3. Unredacted/Redacted Version
4. Proof of Service

Trial: October 10, 2017

I, Neel Chatterjee, declare as follows:

1. I am a partner at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Portions of Its Opposition and Notice to Join and Adopt Defendants Uber Technologies, Inc.’s and Ottomotto LLC’s Opposition to Plaintiff Waymo LLC’s Motion for Continuance of Trial Date (the “Opposition and Joinder”).

2. I have reviewed the following document and confirmed that only the portions identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal	Designating Parties
Opposition and Joinder	Yellow highlighted portions	Anthony Levandowski

3. The above referenced portions of the Opposition and Joinder contain information designated by Anthony Levandowski as “Confidential” under the terms of the parties’ protective order. Otto Trucking takes no position as to the merits of the confidentiality designations in this document.

4. Otto Trucking anticipates that Mr. Levandowski will file a declaration in accordance with Local Rule 79-5.

5. Otto Trucking’s request to seal is narrowly tailored to those portions of the Opposition and Joinder supporting documents that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 18th day of September, 2017 in Menlo Park, California.

/s/ Neel Chatterjee
Neel Chatterjee